

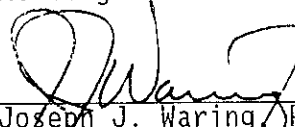
Meeting Minutes Transmittal

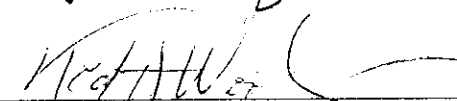
CENTRAL WASTE COMPLEX
Project Managers Meeting/Part B Workshop
2440 Stevens Center, Room 2664
Richland, Washington

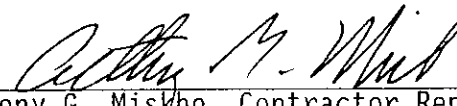
December 18, 1997
12:00 p.m. to 4:00 p.m.

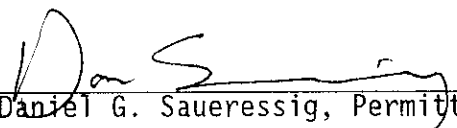
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The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above-dated Project Managers Meeting.


Joseph J. Waring, Program Manager, DOE-RL Date: 1/20/98


Ted A. Wooley, Unit Manager, for Laura Cusack, Project Manager,
Washington State Department of Ecology Date: 1/20/98


Anthony G. Miskno, Contractor Representative, FDH Date: 1/20/98


Daniel G. Saueressig, Permitting Representative, WMH Date: 1/20/98
Central Waste Complex, WMH Concurrence

~~Not Present~~  for Date: 1/30/98
Kent M. McDonald, Contractor Representative, WMH
(Represented by Larry. R. Olsen, WMH)

Purpose: Discuss permitting process.

Meeting Minutes are attached. The minutes are comprised of the following:
Attachment 1 - Agenda
Attachment 2 - Summary of Discussion and Commitments/Agreements
Attachment 3 - Attendance List
Attachment 4 - Action Items
Attachment 5 - Notice of Deficiency Response Table with Agreements/Actions
Resulting from Part B Workshop

Distribution:

W. D. Adair	FDH	(H6-21)*
M. D. Aichele	WMH	(T4-03)*
R. R. Ames	WMH	(T4-03)
L. D. Arnold	FDH	(G3-27)*
E. S. Aromi	WMH	(T3-01)*
R. C. Bowman	WMH	(H6-24)*
R. M. Carosino	RL	(A4-52)
C. E. Clark	RL	(A5-15)*
R. H. Engelmann	WMH	(H6-26)*
E. G. Erpenbeck	FDNW	(G3-15)*
R. J. Giroir	WMH	(T4-05)*
J. W. Golden	FDH	(N1-26)*
R. F. Guercia	RL	(S7-55)*
R. M. Irwin	WMH	(T4-03)*
P. J. Macbeth	GSSC	(R3-82)*
K. M. McDonald	WMH	(T4-04)*
A. C. McKarns	RL	(A5-15)
A. G. Miskho	FDH	(H6-23)*
L. R. Olsen	WMH	(T4-61)
S. M. Price	FDH	(H6-23)*
F. A. Ruck III	FDH	(H6-23)*
D. G. Saueressig	WMH	(H6-24)
H. T. Tilden II	PNL	(P7-79)
B. D. Williamson	FDH	(B3-15)*
J. A. Winterhalder	WMH	(H6-21)*
T. A. Wooley	Ecology	(B5-18)
M. T. Yasdick	WMH	(H6-10)*
RCRA Files	WMH	(H6-23)

*cc:Mail

ADMINISTRATIVE RECORD: Central Waste Complex, TS-2-4 [Care of EDMC, FDH (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste Hanford Files,
P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101,
Mail Stop HW-070 (Records Center)

Please send comments on distribution list to D. Saueressig, WMH
(H6-24), (509) 376-9739

Attachment 1

CENTRAL WASTE COMPLEX
Project Managers Meeting/Part B Workshop
2440 Stevens Center, Room 2664
Richland, Washington

December 18, 1997
1:00 p.m. to 4:00 p.m.

AGENDA

1. PREVIOUS MEETING MINUTES
2. PERMIT APPLICATION STATUS

- Part B NOD Workshop Schedule (D. Saueressig - WMH)

3. GENERAL TOPICS

- Past Action Items

3-21-96:3 Check to see if there is some type of
quantifiable criteria by which CWC personnel
determine whether a spill is major or minor.
ACTION: Mr. Miskho (FDH)

CLOSED

5-31-96:2 WMH will provide Ecology (T. Wooley) the
comparison between the unit specific BEP versus
the Hanford Contingency Plan(s) at the next PMM.
ACTION: Mr. Miskho (FDH)

CLOSED

11-12-96:1 Mr. Wooley, (Ecology) will provide Mr. McKarns
(DOE-RL), Mr. Saueressig (WMH) and Mr. Miskho
(FDH) an outline of the detail he is requesting
to be included in the Building Emergency Plan.
ACTION: Mr. Wooley (Ecology)

CLOSED

11-12-96:2 Mr. Miskho (FDH) will determine a course of
action in an effort to provide a Building
Emergency Plan to meet Ecology's approval.
ACTION: Mr. Miskho (FDH)

CLOSED

12-11-96:1

Mr. Olsen (WMH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC.

ACTION: Mr. Olsen (WMH)

OPEN

- New Action Items

4. SCHEDULE NEXT MEETING

- Tentative Date

5. PART B WORKSHOP

Attachment 2

CENTRAL WASTE COMPLEX Project Managers Meeting/Part B Workshop 2440 Stevens Center, Room 2664 Richland, Washington

December 18, 1997
1:00 p.m. to 4:00 p.m.

Summary of Discussion and Commitments/Agreements

1. PREVIOUS MEETING MINUTES

The November 17, 1997 Project Manager Meeting (PMM) minutes were approved. The 8/9/97 meeting minutes will be approved following a discussion between Mr. T. Wooley (Ecology) and Mr. K. McDonald (WMH) regarding the verification on the percentages of nonhazardous sludge, and the gram quantities that were listed.

2. PERMIT APPLICATION STATUS

- Part B NOD Workshop Schedule

Mr. D. Saueressig (WMH) distributed a revised Notice of Deficiency (NOD) workshop schedule, and he stated that the parties are behind schedule. Mr. Saueressig noted that the Waste Analysis Plan (WAP), Building Emergency Plan (BEP) and the training plan are stand-alone documents, which are being prepared outside of the NOD workshop process, and will be inserted into the Part B Permit Application once they are approved. Mr. Saueressig indicated that the parties may have to schedule extra NOD workshops in an effort to approve the remaining Part B Permit Application chapters and meet the June 15, 1998 Mod D submittal date.

Mr. Saueressig reported that he has received internal comments on the WAP, and he plans to submit a draft WAP to Ecology the first of January 1998. Mr. Saueressig noted that the original schedule provided for the WAP to have been through the NOD cycle. Mr. T. Wooley (Ecology) acknowledged the necessity for flexibility in revising the schedule, but he indicated that he would not compromise the quality of the Part B Permit Application in order to meet the schedule. Mr. J. Waring (DOE-RL) expressed concern regarding the disparity among Ecology, DOE-RL and the contractors in reaching agreement on certain NODs. Mr. Waring suggested taking the approach during the workshops to develop a list of NODs that the parties cannot agree to and elevating that list to a higher level for resolution. Mr. T. Miskho (FDH) added that another concern with meeting the schedule is funding availability, which has been allocated according to the schedule.

3. GENERAL TOPICS

- Past Action Items

12-11-96:1, Mr. Olsen (WMH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC.

This action item remained open.

11-17-97:1, Mr. L. Olsen (WMH) will determine whether a final report on the disposition of the Argonne containers will be generated.

This action item was not discussed. An update will be provided at the next PMM.

- New Action Items

There were no new action items.

4. SCHEDULE NEXT MEETING

- Tentative Date

The next PMM and NOD workshop was scheduled for January 20, 1998, from 1:00 to 4:00 p.m. in Richland, Washington.

- Proposed Topics

Proposed topics may be submitted to Mr. Saueressig.

5. PART B WORKSHOP

A Part B Permit Application NOD workshop was held following the PMM.

Attachment 3

CENTRAL WASTE COMPLEX
Project Managers Meeting/Part B Workshop
2440 Sevens Center, Room 2664
Richland, Washington

December 18, 1997
1:00 p.m. to 4:00 p.m.

Attendance List

Name	Organization	Phone #
Ted Wooley	Ecology	736-3012
Paul Macbeth	GSSC	372-2289
Randy Ames	WMH	373-2067
Kathy Knox	Knox Court Reporting	946-5535
Dan Saueressig	WMH	376-9739
Rick Engelmann	WMH	376-7485
Larry Olsen	WMH	376-8737
Tony Miskho	FDH	376-7313
Joe Waring	DOE-RL	373-7687
Tony McKarns	DOE-RL	376-8981

Attachment 4
CENTRAL WASTE COMPLEX
Project Managers Meeting/Part B Workshop
2440 Stevens Center, Room 2664
Richland, Washington

December 18, 1997
1:00 p.m. to 4:00 p.m.

Action Items

<u>Action Item #</u>	<u>Description</u>
12-11-96:1	Mr. L. Olsen (WMH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC. ACTION: Mr. Olsen (WMH) OPEN
11-17-97:1	Mr. L. Olsen (WMH) will determine whether or not a report will be generated regarding disposition of the Argonne containers. ACTION: Mr. Olsen (WMH) OPEN

Attachment 5

CENTRAL WASTE COMPLEX
Project Managers Meeting/Part B Workshop
2440 Stevens Center, Room 2664
Richland, Washington

December 18, 1997
1:00 p.m. to 4:00 p.m.

NOTICE OF DEFICIENCY RESPONSE TABLE
WITH AGREEMENTS/ACTIONS RESULTING
FROM PART B WORKSHOP

Hanford Facility Dangerous Waste Permit Application,
Central Waste Complex DOE/RL-91-17 WD2
Notice of Deficiency Table No. 1

No.	Comment/Requirement
3.	<p data-bbox="249 511 1913 641"><u>Page 2-1, Section 2.0.</u> <u>Comment:</u> Ecology's Dangerous Waste Permit Application Requirements document, sections B-1a(2) and (3) have not been addressed. Items, such as a detailed flow diagram description of the dangerous waste management operations and any Dangerous Waste Regulations regarding "treatment by generator," are missing from this section.</p> <p data-bbox="249 670 1848 735"><u>Requirement:</u> Review the permit application requirements, as referenced above, and revise the Part B accordingly.</p> <p data-bbox="249 764 1944 954"><u>DOE-RL/FDH Response:</u> Per the Ecology Part B checklist [B-1a(2)], this information is referenced and discussed in Chapters 3.0 and 4.0 and Appendix 3A per the Ecology Part B checklist [B-1a(2)] guidance that duplicate information is not required. This draft permit application was developed before the Waste Analysis Plan (WAP) guidance was finalized. The WAP will be revised before the next submittal to incorporate the guidance. Treatment by generator activities are outside the scope of this permit application.</p>
<p>OPEN PENDING REVIEW OF WASTE ANALYSIS PLAN AND DISCUSSION ON POINT OF GENERATION (E.G., SPILL CLEANUP [POG: y], REPACKAGING [POG: ?], AND MOVEMENT OF CONTAINERS [POG: N]) (6/4/97). MORE DETAIL ON TREATMENT WILL BE INCLUDED IN THE WASTE ANALYSIS PLAN AND CHAPTER 4.0. A DETAILED FLOW DIAGRAM OF THE WASTE ACCEPTANCE PROCESS WILL BE INCLUDED IN THE WASTE ANALYSIS PLAN (7/9/97).</p>	
7.	<p data-bbox="249 1149 1927 1279"><u>Page 3-1, Section 3.1.</u> <u>Comment:</u> Although the reference to the Dangerous Waste Application Requirements is correct, the section does not fulfill the prescribed elements laid out in C-1 and C-1(a). C-1(a) stipulates the following: "Include the identity and concentration of all constituents and physical properties"</p> <p data-bbox="249 1308 1793 1354"><u>Requirement:</u> Clarify how the text presented in section 3.1 meets the elements of C-1 and C-1(a).</p> <p data-bbox="249 1383 1906 1448"><u>DOE-RL/FDH Response:</u> This draft permit application was developed before the WAP guidance was finalized. The WAP will be revised before the next submittal to incorporate the guidance.</p>

8. Page 3-1, line 14. Comment: This sentence identifies mixed waste as being the only type of waste that can be stored in CWC. Does this mean there is absolutely no "non-mixed" dangerous waste currently stored at CWC?

Requirement: Provide information to answer the above question.

DOE-RL/FDH Response: The CWC can accept any type of radioactive waste, however, for the purpose of this Part B, mixed waste and only the dangerous waste portion of that mixed waste (excluding radionuclides) is subject to Ecology regulation. The CWC also can store low-level waste and transuranic waste and this waste is not subject to Ecology regulation. The CWC mission supports these waste management activities. This draft permit application was developed before the WAP guidance was finalized. The WAP will be revised before the next submittal to incorporate the guidance.

CLOSED. PAGE 3-1, LINE 14 WAS REWRITTEN (12/18/97).

12. Page 4-2, line 41. Comment: This section is incomplete. The secondary containment calculations (as noted in Appendix 4C) are not yet available. This requirement must be met during interim status, just as it would be required in final status.

Requirement: Provide these calculations as soon as possible. The Part B cannot be approved without these calculations completed and inserted into the document.

DOE-RL/FDH Response: The secondary containment calculations were included in Revision 0. These calculations are currently being converted to metric per a DOE-RL direction, field walkdowns are being performed to verify previous calculations completed from design drawings, and will be provided when completed.

OPEN PENDING COMPLETION OF INFORMAL RL TRANSMITTAL OF REVISED SECONDARY CONTAINMENT CALCULATIONS. RUN-OFF DISCUSSIONS RELATED TO SECTION 4.1.2.2 ARE PENDING (8/13/97).

13. Page 4-3, line 27. Comment: How can sections 4.1.2.2 and 4.1.2.3 be completely accurate if the secondary containment calculations, as noted in comment #12, are not complete?

Requirement: Explain how discussions provided in sections 4.1.2.2 and 4.1.2.3 are valid without the appropriate calculations completed.

DOE-RL/FDH Response: Refer to response to comment 12. Once the secondary containment calculations are converted to metric provided to Ecology, the sections referencing these calculations will be verified.

OPEN PENDING RESOLUTION OF COMMENT #12 (8/13/97).

15. Page 4-4, line 21. Comment: In what building is the logbook kept and what type of release would facilitate a change to the logbook.

Requirement: Please provide answers for the above questions.

DOE-RL/FDH Response: The logbook usually is kept at M0-288 during operating hours. All other times, the logbook is stored in M0-720 in a fire resistant file cabinet (on the waste receiving and staging area). Any release of accumulated water from the Mixed Waste Storage Pad trench is recorded in the logbook regardless of quantity.

OPEN PENDING REVIEW OF RAIN WATER DISCHARGE PERMITTING REQUIREMENTS (8/13/97). OPEN PENDING FURTHER REVIEW BY ECOLOGY AND WMH (10/01/97). OPEN PENDING ECOLOGY/WMH REVIEW OF INTERIM REQUIREMENTS IN THE LIQUID EFFLUENT CONSENT ORDER FOR STORM WATER DISCHARGES (10/15/97). CLOSED (12/18/97).

16. Page 4-5, line 26. Comment: Who is responsible for developing a sampling and analysis plan for the wipe sampling events?

Requirement: Revise document to include more detail on the development and implementation of the sampling plan.

DOE-RL/FDH Response: There is no sampling plan for the cleanup of spills. Procedures are in place to clean up spills and to verify the adequacy of the cleanup. Sampling plans are prepared for closure activities, but are not required by WAC 173-303 for spill cleanup.

~~OPEN - DEFER TO BUILDING EMERGENCY PLAN (9/15/97).~~ PAGE 4-5, LINES 13-16 WILL BE DISCUSSED IN THE WAP. WMH WILL DETERMINE THE PURPOSE OF WIPE SAMPLING (E.G. RAD OR CHEMICAL) AND WILL MAKE A RECOMMENDATION TO EITHER RETAIN OR DELETE THE LANGUAGE FROM THE PERMIT APPLICATION. RL RESPONSE WILL BE MODIFIED ACCORDINGLY (10/15/97). RL/CONTRACTORS TO MEET AND DISCUSS WIPE SAMPLING AS RELATED TO USE OF RADIOACTIVITY AS AN INDICATOR OF DANGEROUS WASTE. (12/18/98).

17-A. BASED ON PAST EXPERIENCE WITH OFFSITE GENERATORS (I.E., ARGONNE NATIONAL LABORATORY), WHAT MODIFICATIONS TO SECTION 4.1.1. WILL OCCUR IN THE PART B PERMIT APPLICATION TO SPECIFY ACCEPTABLE PACKING MATERIAL (E.G. ABSORBANTS).

DOE-RL/FDH Response: Additional text will be drafted to address acceptance criteria for the absorbants used.

OPEN (9/15/97). OPEN PENDING REVIEW OF TEXT TO BE PROVIDED BY RANDY/LARRY. VERIFY THAT ATG CAN ACCEPT WASTE WITH THE TYPE OF ABSORBANTS WE ARE USING. (10/02/97). OPEN PENDING SORBENT PARAGRAPH TO BE PROVIDED TO ECOLOGY (12/18/97).

18. Page 4-7, line 16. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(1). The following direction is given: "Provide sketches, drawings, or data that containers of reactive waste exhibiting a characteristic specified in WAC 173-303-090(7)(vi), (vii) or (viii) are stored in a manner equivalent . . . ," but is not indicated in the text currently in the permit application.

Requirement: Explain why all of the information identified in D-1f(1) is not provided in section 4.3.1. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will be considered as unfulfilled.

DOE-RL/FDH Response: Per the Ecology Part B checklist, this section will be evaluated against what is required by applicable WAC 173-303 regulations. ~~Figures in Chapter 1.0 provide details. RL/Contractors will provide sketches, drawings or data in the permit application to demonstrate how the reactive wastes described in WAC 173-303-630(8)(a) will be managed in a manner equivalent with the UFC table.~~

OPEN PENDING ECOLOGY/CONTRACTOR REVIEW OF SITE PLANS/WAC REQUIREMENTS (9/15/97). THIS SECTION WILL BE EVALUATED BY COMPARING THE CHECKLIST ITEMS AGAINST THE DESIGNATED SECTIONS FOR ACCURACY (10/02/97). TONY MCKARNS TO PROVIDE ECOLOGY WITH TOPOGRAPHIC MAP. DISCUSSION WITH ECOLOGY REQUIRED PERTAINING TO PE CERTIFICATION ON DESIGN DRAWINGS. DATA PERTAINING TO UFC/NFPA REQUIREMENTS WILL BE PROVIDED TO ECOLOGY. RL/CONTRACTORS TO DETERMINE WHICH PARTS OF APPENDICES 4A/4B ARE CERTIFIED BY PE (12/18/97).

19. Page 4-7, line 23. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(2). The following direction is given: "Provide sketches, drawings, or data demonstrating that container storage of ignitable waste and reactive waste." Requirements listed in section D-1f(2) go beyond what the permit language currently includes.

Requirement: Explain why all of the information identified in D-1f(2) is not provided in section 4.3.2. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will be considered as unfulfilled.

DOE-RL/FDH Response: Per the Ecology Part B checklist, this section will be evaluated against what is required by applicable WAC 173-303 regulations. ~~Figures in Chapter 1.0 provide details.~~ RL/Contractors will provide sketches, drawings or data in the permit application to demonstrate how the reactive wastes described in WAC 173-303-630(8)(b) will be managed in a manner equivalent with the UFC table.

OPEN PENDING ECOLOGY/CONTRACTOR REVIEW OF SITE PLANS/WAC REQUIREMENTS (9/15/97). THIS SECTION WILL BE EVALUATED BY COMPARING THE CHECKLIST ITEMS AGAINST THE DESIGNATED SECTIONS FOR ACCURACY (10/02/97). TONY MCKARNS TO PROVIDE ECOLOGY WITH TOPOGRAPHIC MAP. DISCUSSION WITH ECOLOGY REQUIRED PERTAINING TO PE CERTIFICATION ON DESIGN DRAWINGS. DATA PERTAINING TO UFC/NFPA REQUIREMENTS WILL BE PROVIDED TO ECOLOGY. RL/CONTRACTORS TO DETERMINE WHICH PARTS OF APPENDICES 4A/4B ARE CERTIFIED BY PE (12/18/97).

20. Page 4-7, line 32. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(32). The following direction is given: "Through sketches, drawings, and/or data demonstrate that a container holding a dangerous that is compatible with any waste" Requirements listed in section D-1f(3) go beyond what the permit application language currently includes.

Requirement: Explain why all of the information identified in D-1f(3) is not provided in section 4.3.3. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will consider as unfulfilled.

DOE-RL/FDH Response: Per the Ecology Part B checklist, this section will be evaluated against what is required by applicable WAC 173-303 regulations. ~~Figures in Chapter 1.0 provide details.~~

OPEN PENDING ECOLOGY/CONTRACTOR REVIEW OF SITE PLANS/WAC REQUIREMENTS (9/15/97). THIS SECTION WILL BE EVALUATED BY COMPARING THE CHECKLIST ITEMS AGAINST THE DESIGNATED SECTIONS FOR ACCURACY (10/02/97). TONY MCKARNS TO PROVIDE ECOLOGY WITH TOPOGRAPHIC MAP. DISCUSSION WITH ECOLOGY REQUIRED PERTAINING TO PE CERTIFICATION ON DESIGN DRAWINGS. RL/CONTRACTORS TO DETERMINE WHICH PARTS OF APPENDICES 4A/4B ARE CERTIFIED BY PE. RL/CONTRACTORS TO DETERMINE NFPA REQUIREMENTS FOR INCOMPATIBLES IN ORDER TO COMPARE WITH THE LANGUAGE IN THE PERMIT APPLICATION DOCUMENT FOR UFC (12/18/97).

21. Page 6-2, line 8. Comment: Section F-2 in the requirements is actually entitled, "Inspection Plan," not "Inspection Requirement." What process does CWC have that would be considered equivalent?

Requirement: Explain how WAC-173-303-806 (4)(a)(v), -303-320, -303-340, 40CFR 270.14, and 264.15 are being met within this section, or even within the permit application.

DOE-RL/FDH Response: This information is contained in Sections 6.2.1, 6.2.1.1, 6.2.1.2, 6.2.2, 6.2.3 and 6.2.3.1 and 6.2.3.2.

OPEN PENDING ECOLOGY REVIEW OF REFERENCED SECTIONS (9/15/97). SPECIFY WHERE IN CHAPTER 6 THE INSPECTION SCHEDULE ITEMS ARE CONTAINED, AND INDICATING PROPER PLACEMENT OF THE CHECKLIST HEADINGS (12/18/97).

22. Page 6-2, line 24. Comment: There is no apparent attempt in this section to meet requirement F-2a(1).

Requirement: Please review the elements identified in F-2a(1) and describe how these are met with the permit application.

DOE-RL/FDH Response: ~~The Ecology Part B checklist is guidance and not everything contained is required by the regulations.~~

OPEN PENDING ECOLOGY/CONTRACTOR REVIEW OF WAC 173-303 AND ECOLOGY GUIDANCE DOCUMENT (9/15/97). THIS SECTION WILL BE EVALUATED BY COMPARING THE CHECKLIST ITEMS AGAINST THE DESIGNATED SECTIONS FOR ACCURACY (10/02/97). SPECIFY WHERE IN CHAPTER 6 THE INSPECTION SCHEDULE ITEMS ARE CONTAINED, AND INDICATING PROPER PLACEMENT OF THE CHECKLIST HEADINGS (12/18/97).

24. Page 6-3, Line 35. Comment: F-2c(1)(c) requires specifying actual timelines for taking corrective action. Line 35 of Section 6.2.2 of the permit application defers discussion of the timeline to the BEP (appendix 7a). The BEP does not indicate a timeline for corrective action.

Requirement: Revise either section 6.2.2 and/or the BEP pursuant to F-2c with regard to all spill types. Please emphasize timeline for corrective actions and positions responsible for taking corrective action or ensuring other staff remedy the problems. If this information is already available, please identify where it exists. Further discussion on adequacy of the information with regard to regulatory requirements will most likely be necessary.

DOE-RL/FDH Response: ~~The Ecology Part B checklist is guidance and not everything contained is required by the regulations.~~

OPEN PENDING ECOLOGY/CONTRACTOR REVIEW OF WAC 173-303 AND ECOLOGY GUIDANCE DOCUMENT (9/15/97). THIS SECTION WILL BE EVALUATED BY COMPARING THE CHECKLIST ITEMS AGAINST THE DESIGNATED SECTIONS FOR ACCURACY. THIS COMMENT WILL BE ADDRESSED AFTER A DECISION IS MADE REGARDING WHAT APPEARS IN CHAPTER 7.0 OF THE APPLICATION. (10/02/97). ECOLOGY/RL/CONTRACTORS WILL REVIEW CHECKLIST SECTION F-2c(1)(c) TO DETERMINE APPLICABILITY WITH REGARDS TO CORRECTIVE ACTION TIMEFRAMES (12/18/97).

25. Page 6-4, line 15. Comment: This section refers the reader to section 6.2.2, which refers the reader to

the BEP for corrective actions other than spills to secondary containment. As discussed in comment #24, the BEP does not adequately address corrective action schedules.

Requirement: Please see requirement #24 with focus on F-2d(1)(b)(i) and (ii).

DOE-RL/FDH Response: Refer to response to comment 24.

OPEN PENDING ECOLOGY/CONTRACTOR REVIEW OF WAC 173-303 AND ECOLOGY GUIDANCE DOCUMENT (9/15/97). THIS SECTION WILL BE EVALUATED BY COMPARING THE CHECKLIST ITEMS AGAINST THE DESIGNATED SECTIONS FOR ACCURACY. THIS COMMENT WILL BE ADDRESSED AFTER A DECISION IS MADE REGARDING WHAT APPEARS IN CHAPTER 7.0 OF THE APPLICATION. (10/02/97). ECOLOGY/RL/CONTRACTORS WILL REVIEW CHECKLIST SECTION F-2c(1)(c) TO DETERMINE APPLICABILITY WITH REGARDS TO CORRECTIVE ACTION TIMEFRAMES (12/18/97).

26. Page 7-1. Comment: Currently, Ecology is having internal discussions on whether the combination of unit specific BEP and Attachment 4 of the Hanford Facility Permit (DOE/RL 91-28) plus other documents, such as, the plant operating procedures and WHC-CM-4-43 actually make up an effective "overall contingency plan." The main questions Ecology has at this time is: (1) When do USDOE and contractors actually consider the BEP implemented, and (2) what does that mean in terms of reporting requirements? Additional NODs will results from that discussion.

Requirement: Please prepare for future discussions on how the combination of all of the documents actually fulfill requirements pursuant to WAC 173-303-350.

DOE-RL/FDH Response: No response required. Answers to questions will be developed during ~~current~~ future discussion with Ecology.

OPEN - ECOLOGY WILL RESUBMIT NOD'S FROM 1996 REGARDING THE BEP FOR CWC (9/15/97). THIS COMMENT WILL BE ADDRESSED AFTER A DECISION IS MADE REGARDING WHAT APPEARS IN CHAPTER 7.0 OF THE APPLICATION (10/02/97).

27. Page 10-1. Comment: There is no mention of intent to meet 40 CFR 264.75(h) and (i) requirements. A quick review of DOE/RL-97-16, the Hanford Site Annual Dangerous Waste Report, indicates some deficiencies. Generator identification is lacking in most cases and there is no mapping of waste location as required in 40 CFR.

Requirement: Review the federal requirements. Revision of -97-16 or Section 10 of the permit application will be necessary.

DOE-RL/FDH Response: The requirements of 40 CFR 264.75(h) and (i) are not met through the Part B Permit Application requirements but through reporting mechanisms outside of the Hanford Facility RCRA permit.

The waste minimization requirements are contained in the HSWA portion of the Hanford Facility RCRA Permit, Condition 11.F and only address the certification requirement of 40 CFR 264.73(b)(9). There is no need to include information regarding 40 CFR 264.75(h) and (i) in the CWC portion of the Hanford Facility Part B Permit Application. This text has been agreed to by Ecology and is reflected in the *Hanford Dangerous Waste Permit Application, General Information Portion* (DOE/RL-91-28), Chapter 10.

OPEN (6/4/97) - RFSH WILL PROVIDE ECOLOGY A COPY OF WASTE MINIMIZATION PLAN FOR SOLID WASTE AND A COPY OF THE ANNUAL REPORT THAT IS GIVEN TO THE WASTE MINIMIZATION GROUP. ~~TONY MISKHO WILL PROVIDE ADDITIONAL INFORMATION TO THE DOE-RL/FDH RESPONSE.~~ CLOSED PENDING ECOLOGY REVIEW OF ANNUAL CERTIFICATION IN CWC OPERATING RECORD (7/9/97). LARRY OLSEN WILL PROVIDE A COPY OF THE CWC WASTE MINIMIZATION CERTIFICATION IN THE OPERATING RECORD TO TED WOOLEY (8/13/97). OPEN PENDING TED REVIEW OF RECORDS ANNUAL CERTIFICATION AND POSITION DESCRIBED IN RESPONSE PERTAINING TO 40 CFR 264.75(h) AND (i) (12/18/97).

30. Page 13-1. Comment: WAC-173-340 will require referencing. Also, as stated in the requirements list, all permits applied for or received from any regulatory agencies.

Requirement: Please revise the permit application to meet this requirement under Section J.

DOE-RL/FDH Response: In accordance with the *Hanford Facility Dangerous Waste Permit Application, General Information Portion* (DOE/RL-91-28) Revision 3, Page 13-1 line 30-31, Section 13.0 of the CWC portion will be revised to include the list of applicable laws and requirements. Descriptions of the applicable laws and requirements are found in the *Hanford Facility Dangerous Waste Permit Application, General Information Portion* (DOE/RL-91-28), Section 13.0 and will not be duplicated. ~~This text has been agreed to by Ecology and is reflected in the General Information Portion (DOE/RL 91 28), Chapter 13.0.~~

OPEN (6/4/97 AND 7/9/97) - PENDING REVIEW OF LIST PLACED INTO SECTION 13.0. TED WILL REVIEW THE REVISED CHAPTER 13.0 AND DISCUSS WITHIN ECOLOGY (8/13/97).

31. Page APP 3A-i. Comment: A detailed set of NODs on the Waste Analysis Plan (WAP) for CWC will be submitted by Ecology in the coming weeks. There are still some outstanding issues on the WAP guidance that need resolution.

Requirement: An agreement of when Ecology will provide NODs on the WAP will be discussed as part of the work shop schedule at the next project managers meeting.

DOE-RL/FDH Response: A CWC WAP addressing the guidance developed during the workshops with DOE-RL, FDH/RFSH, and Ecology will be developed.

32. Page APP 4C-i. Comment: When will secondary containment calculations be available? The part B cannot be

approved prior to having the calculations.

Requirement: Please give a date.

DOE-RL/FDH Response: Refer to response to comment 12. Secondary containment calculations will be provided by July 31, 1997.

33. Page APP 4D-i. Comment: There is no information on how durable the sealant is in terms of reaction to chemical spills and physical damage from drum movement. MSDS information, although necessary, does not whether the sealant is appropriate for the application it is being used for.

Requirement: Revise the permit application, adding the requested information.

DOE-RL/FDH Response: Although the regulations do not require the installation of a protective coating over the concrete floors, this added protection for the concrete exceeds what is required by the regulations. The MSDS's provide general physical and chemical descriptions of the coatings.

OPEN - LARRY/KENT WILL PROVIDE THE SPECIFICATIONS FOR THE SEALANT (10/02/97). TED TO REVIEW INFORMATION ON SEALANT SPECIFICATIONS. DISCUSSION AMONG CONTRACTORS NECESSARY ON WHAT IS SUFFICIENTLY IMPERVIOUS "630(7)(a)(i)" (12/18/97).

34. Page APP 7A-i. Comment: Ecology is not prepared to give a complete set of NODs on the BEP because of current internal discussions.

Requirement: A date will be set for submittal of BEP NODs. NODs were submitted in January 1996 which, at a minimum, will require completed resolution. Additional NODs will be dependent on the outcome of Ecology discussions.

DOE-RL/FDH Response: No response required. Answers to questions will be developed during future discussions with Ecology.

THIS COMMENT WILL BE ADDRESSED AFTER A DECISION IS MADE REGARDING WHAT APPEARS IN CHAPTER 7.0 OF THE APPLICATION (10/02/97).

35. Page APP 8A-i. Comment: There is no reference to Section H the Dangerous Waste Application Requirements document, Why?

Requirement: To be consistent and to have the correct focus on training requirements, please reference Section H.

DOE-RL/FDH Response: Section H is complied with by directing the reader in Chapter 8 to Appendix 8A. Appendix 8A contains the Solid Waste Disposal training plan. This training plan is included in the 616 Nonradioactive Dangerous Waste Storage Facility (616 NRWDSF) Permit, which has been accepted by Ecology, and included in the HF RCRA Permit, Part III, Chapter 1.

OPEN PENDING ECOLOGY REVIEW OF NEW TRAINING PLAN (12/18/97).

36. Page 12, 1st para. under bullets. Comment: What happens with personnel who cannot pass the training requirements. Are they restricted from doing related work?

Requirement: Please clarify how training deficiencies are handled.

DOE-RL/FDH Response: Personnel are retested and/or provided with additional instruction. If the personnel cannot pass the required tests necessary to perform his/her job, this individual is (1) not allowed to perform this particular job or (2) is allowed to perform the job, but under close supervision (this depends on the hazards associated with the job).

OPEN PENDING ECOLOGY REVIEW OF NEW TRAINING PLAN (12/18/97).

37. Page 13, 1st sentence. Comment: Define exempt personnel.

Requirement: For clarification purposes, please define which positions are considered exempt.

DOE-RL/FDH Response: Refer to the Fair Labor Standard Act of 1964. This term does not infer that an employee does not have to meet specific requirements, but refers to how the human resources organization manages payroll.

OPEN PENDING ECOLOGY REVIEW OF NEW TRAINING PLAN (12/18/97).

38. Page 15, Section 5.11. Comment: How long is a person allowed to remain in the remedial training program, and what work restrictions are imposed on them during this time?

Requirement: Please answer questions.

DOE-RL/FDH Response: Remedial training program is determined by the individual's immediate manager/supervisor. Remedial training programs generally do not exceed 6 months; however, this is up to the immediate manager/supervisor.

OPEN PENDING ECOLOGY REVIEW OF NEW TRAINING PLAN (12/18/97).

39. Page A-1, 1st para. Comment: What process is in place for determining what type of training applies to a specific position?

Requirement: Clarify how this determination is made.

DOE-RL/FDH Response: This is an ongoing process. Any changes in operations are evaluated and a determination is made if additional, reduced, or no change is required. Personnel are then trained accordingly based on this ongoing evaluation.

OPEN PENDING ECOLOGY REVIEW OF NEW TRAINING PLAN (12/18/97).

40. Page A-2, Training Matrix. Comment: This table is confusing.

Requirement: Part of a project managers meeting will be devoted to discussion on how to use the table.

DOE-RL/FDH Response: No response required. Answers to questions will be developed during future discussions with Ecology.

OPEN PENDING ECOLOGY REVIEW OF NEW TRAINING PLAN (12/18/97).

41. Page A-12, Category G. Comment: The 40 hour and 16 hour Hazardous Waste Operations Training is considered "Non-RCRA," why?

Requirement: Clarify how this is categorized as "Non-RCRA."

DOE-RL/FDH Response: This training is required by OSHA and 29 CFR 1910.120 and not the dangerous waste regulations. This is Health and Safety training and not waste management training.

OPEN PENDING ECOLOGY REVIEW OF NEW TRAINING PLAN (12/18/97).

42. Appendix 8A Comment: Training plan does not contain names as required by 330(2)(a).

Requirement: Meet requirements of 330(2)(a).

DOE-RL/FDH Response: RL/contractors need to have discussions with Ecology on names in training plans.